

ROBERT G.
GERBER, INC.

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June 15, 1994

File #963

Ms. Loukia Lofchis
Brunswick Area Citizens for a Safe Environment
P. O. Box 245
Brunswick, ME 04011

Subject: Review of "Draft Proposed Plan, Site 9, Neptune Drive Disposal Site", Naval Air Station Brunswick, Brunswick, Maine, May 1993 [1994].

Dear Ms. Lofchis:

As requested by the Brunswick Area Citizens for a Safe Environment (BACSE), Robert G. Gerber, Inc. (Gerber), has reviewed the "Draft Proposed Plan, Site 9, Neptune Drive Disposal Site" for Naval Air Station Brunswick, Brunswick, Maine, dated May 1993 (see Comment 2 below). This document was prepared by ABB Environmental Services, Inc. (ABB-ES) for the U. S. Department of the Navy for the Naval Air Station Brunswick (NAS Brunswick) located in Brunswick, Maine. In the subject document, the Navy proposes an interim remedial action plan addressing groundwater contamination at the Neptune Drive Disposal Site.

Site 9, also known as the Neptune Drive Disposal Site, is located in the central portion of NAS Brunswick. The site initially included three areas of potential contamination: the location of a former incinerator and an associated ash disposal area; an area reportedly used for burning and disposal of solvents; and two streams exhibiting iron-staining characteristic of leachate. Results of earlier environmental investigations were reported in the August 1990 *Draft Final Remedial Investigation (RI)* and the April 1991 *Draft Final Supplemental RI* reports prepared by E. C. Jordan. The September 1993 *Draft Technical Memorandum for Site 9* presented a summary of investigations and analysis conducted through 1993, and recommendations for future activities at the site. Several of the issues we raised in our review of the September 1993 and earlier versions of the Technical Memorandum have been broached at subsequent meetings of the Technical Review Committee, and remain outstanding.

The subject document presents the Navy's preferred alternative for an interim remedial action for groundwater at Site 9, that includes groundwater remediation by natural attenuation, implementation of institutional controls to prevent human exposure, and long-term monitoring of groundwater, surface water, and sediments to evaluate changes in environmental quality. The Navy also intends to conduct additional-source investigations that will guide the selection of a

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final remedial action for Site 9 at some future date, although neither the additional investigations nor the final remedial alternative are specifically addressed in the subject document. The Navy's proposed interim remedial action for Site 9 will be the subject of a public hearing on July 14, 1994. Members of the public will have an opportunity to present oral or written comments to the Navy at that time. Written comments on the final proposed plan may also be submitted to the Navy during the public comment period between July 8 and August 6, 1994.

We have summarized our comments and concerns in the following:

1. Cover Page. The date on the cover page should be May 1994, not May 1993.
2. Page 1-1. It would be helpful if the Introduction (and Possibly Section 9) included an explanation of why an "interim" remedial action for only groundwater is necessary or desirable at this time, given that the Navy will undertake additional source investigations and that the "final" remedy for Site 9 will be selected at a later date. In other words, why not wait until the additional investigations are completed before selecting a remedial alternative. It would also be helpful to have an idea of when the Navy anticipates conducting the additional source investigations, and approximately when the final remedial action will be selected.
3. Page 1-3. The last sentence on the page should clarify that it is the Navy's preferred alternative for "interim action of the groundwater operable unit" at Site 9.
4. Page 1-1. The second sentence in Section 2.0 appears to be incomplete.
5. Page 2-3. Written comments mailed to Mr. Evans should be postmarked no later than August 6, 1994, rather than July 8th.
6. Page 2-4. Is a signature by the Commissioner of the Maine Department of Environmental Protection (DEP) also required for the ROD (Record of Decision) to be final.
7. Page 3-5. The final paragraph in Section 3.0 should clarify that the Navy intends to conduct additional source investigations at Site 9.
8. Page 3-6. The text should mention that, in addition to the conflicting information regarding the dates the incinerator and disposal area operated, there is a lack of precise information concerning the location, size, types of wastes handled, and other characteristics of the two areas. The text should also include a brief statement as to why the old drain mentioned at the bottom of the page is a concern.
9. Page 3-7. It would be helpful if the legend for Figure 3-2 included the symbol for an intermittent stream and a topographic contour.

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10. Page 3-8. The appropriate reference citation (ARB-ES, 1993) should be included after the Technical Memorandum is mentioned.

11. Pages 3-11 and 3-13. We were unable to find the location on Figure 3-4 of the sample described on page 3-11 as containing 30.5 mg/kg polynuclear aromatic hydrocarbons (PAHs).

12. Pages 3-20 - 3-30. The reference citation for the source of the 1993 investigation results should be included in Section 3-3.

13. Page 3-29. While PAHs may be associated with the burned materials observed in borings, they may also be associated with unburned material disposed at the site.

14. Page 3-29. What is the significance of and the reason for the difference in the groundwater level reported in the RI and measured during the 1993 investigations?

15. Page 3-31. It is not appropriate to say that the former incinerator and ash disposal area have not contributed to the VOC contamination downgradient of the disposal area.

16. Page 3-31. The statement at the bottom of the page that the final proposed plan will incorporate additional investigations and any other remediation that may be necessary at Site 9 is confusing. The subject document is the draft Proposed Plan for Site 9. Presumably there will be a final version of the subject document after the public hearing is held in July 1994. The statement on page 3-31 implies there will be another sequence of draft and final Proposed Plans for Site 9 once the additional source investigations are conducted. If that is the case, the text should be clarified.

17. Page 4-6. What is the ecological Hazard Index for PAHs. While we did not verify the validity of the background concentrations for PAHs at NAS Brunswick cited in the subject document, the average concentration for PAHs detected in the stream sediments at Site 9 is more than three times the highest background concentration cited. In addition, the greatest concentration detected is more than ten times the highest background concentration. The concentrations of PAHs detected in the Site 9 stream sediments appear to justify additional investigation regarding potential sources, ecological impacts, and possible remediation.

18. Page 4-6. What is the source area for the surface water sampled at location SW-915.

19. Page 4-7. The calculated Hazard Indexes of 3.0 and 6.0 appear to be more than "slight" exceedances of the EPA's target Hazard Index of 1.0 for acceptable risk.

20. Page 5-1. Additional information may indicate that possible source areas of contamination on both sides of Neptune Drive, not just the North side, should be investigated.

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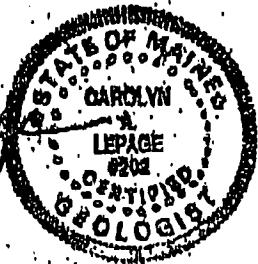
21. Page 5-2. What is the basis for stating that remedial actions for reducing PAH or pesticide concentrations in stream sediments would provide only minimal environmental and might significantly harm the stream ecosystem. In addition, the statements regarding the presence of PAH and DDT in the stream should be revised to indicate that both parameters are interpreted as not resulting from past disposal activities at Site 9.
22. Page 6-2. The sentence beneath the heading describing the preferred alternative should mention remediation of groundwater through attenuation and institutional controls in addition to long-term monitoring of the groundwater operable unit.
23. Page 6-4. Examples of institutional controls likely to be considered for Site 9 should be included in the paragraph at the top of the page. The statement concerning submitting the long-term monitoring for agency review and comment should be revised to address agency approval.
24. Page 6-5. It is not clear how the results of the additional source investigations will be evaluated in conjunction with the long-term monitoring results. How does the reevaluation of the interim remedial action mentioned in the last sentence on page 1-1 figure into the long-term monitoring plan. In addition, what is the basis for the estimated costs provided. How many samples will be collected, and how will they be analyzed. The estimated cost figures provided seem low given the number of monitoring wells and surface water and sediment sampling locations at Site 9.
25. Page 8-1. The last sentence in the second paragraph should be revised to indicate that the use of source controls is not considered necessary as part of the interim remedial action for groundwater.

Please do not hesitate to give us a call if you have any questions on the comments above.

Sincerely,
Robert G. Gerber, Inc.

Carolyn A. Lepage

Carolyn A. Lepage, C.G.
Director of Operations



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